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9 **UNITED STATES DISTRICT COURT**
10 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**
11 **WESTERN DIVISION**
12

13 MAINE STATE RETIREMENT
SYSTEM, Individually and On Behalf
14 of All Others Similarly Situated,

15 Plaintiffs,

16 v.

17 COUNTRYWIDE FINANCIAL
CORPORATION,
18 a Delaware corporation, et al.,

19 Defendants.
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Case No. CV 10-0302-MRP (MANx)

**DEFENDANT STANFORD L.
KURLAND'S REPLY IN SUPPORT
OF REQUEST FOR JUDICIAL
NOTICE IN SUPPORT OF
MOTION TO DISMISS COUNTS I
AND III OF THE AMENDED
CONSOLIDATED CLASS ACTION
COMPLAINT**

Date: October 18, 2010
Time: 11:00 a.m.
Crtrm.: 12

Trial Date: None Set

1 The Request for Judicial Notice filed by Defendant Stanford L. Kurland
2 (“Kurland”) (Dkt. No. 150) asks that the Court take notice of the Form 8-K filed
3 with the SEC by Countrywide Financial Corporation (“Countrywide”), dated
4 September 8, 2006, and the fact contained therein that Kurland was terminated as
5 Countrywide’s President and Chief Operating Officer of Countrywide on
6 September 7, 2006. (Dkt. Nos. 150-151.) Kurland’s departure date—reported by a
7 publicly traded company in a periodic report filed with the Securities and Exchange
8 Commission—“cannot reasonably be questioned,” Fed. R. Evid. 201(b)(2), and
9 Plaintiffs do not argue to the contrary in their opposition to defendants’ requests for
10 judicial notice. (See Dkt. No. 183 at 4.) Accordingly, the Court should grant
11 Kurland’s Request for Judicial Notice. Kurland also joins in the requests for judicial
12 notice and supporting arguments of other defendants.

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14 DATED: September 27, 2010

Respectfully submitted,

15 CALDWELL LESLIE & PROCTOR, PC
16 CHRISTOPHER G. CALDWELL
17 DAVID C. CODELL, Of Counsel
18 ANDREW ESBENSHADE

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20 By _____/s/
21 DAVID C. CODELL
22 Attorneys for Defendant
23 STANFORD L. KURLAND
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